

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, JANE HAMILTON,)
SERGIO DELEON, FLOYD J. CARRIER,)
ANNA BURNS, MICHAEL MONTEZ,)
PENNY POPE, OSCAR ORTIZ, KOBY)
OZIAS, JOHN MELLOR-CRUMLEY, PEGGY)
HERMAN, EVELYN BRICKNER, GORDON)
BENJAMIN, KEN GANDY, LEAGUE OF)
UNITED LATIN AMERICAN CITIZENS)
(LULAC), AND DALLAS COUNTY, TEXAS,)
Plaintiffs,) CIVIL ACTION NO.
v.) 2:13-CV-193 (NGR)
RICK PERRY, Governor of Texas; and JOHN)
STEEN, Texas Secretary of State,) [Lead case]
Defendants.)
UNITED STATES OF AMERICA,)
Plaintiffs,)
TEXAS LEAGUE OF YOUNG VOTERS)
EDUCATION FUND, IMANI CLARK,)
AURICA WASHINGTON, CRYSTAL)
OWENS, AND MICHELLE BESSIAKE,)
Plaintiff-Intervenors,)
TEXAS ASSOCIATION OF HISPANIC)
COUNTY JUDGES AND COUNTY)
COMMISSIONERS, HIDALGO COUNTY,)
AND MARIA LONGORIA BENAVIDES,)
Plaintiff-Intervenors,) CIVIL ACTION NO.
v.) 2:13-CV-263 (NGR)
STATE OF TEXAS, JOHN STEEN, in his)
official capacity as Texas Secretary of State;)
and STEVE McCRAW, in his official capacity)
as Director of the Texas Department of Public)
Safety,)
Defendants.)

TEXAS STATE CONFERENCE OF NAACP)
BRANCHES; and the MEXICAN)
AMERICAN LEGISLATIVE CAUCUS OF)
THE TEXAS HOUSE OF)
REPRESENTATIVES,)
Plaintiffs,)
v.) CIVIL ACTION NO.
JOHN STEEN, in his official capacity as) 2:13-CV-291 (NGR)
Secretary of State of Texas; and STEVE) [Consolidated case]
McCRAW, in his official capacity as Director)
of the Texas Department of Public Safety,)
Defendants.)
BELINDA ORTIZ, LENARD TAYLOR,)
EULALIO MENDEZ JR., LIONEL)
ESTRADA; ESTELA GARCIA ESPINOSA,)
ROXANNE HERNANDEZ, LYDIA LARA,)
MARGARITO MARTINEZ LARA,)
MAXIMINA MARTINEZ LARA, AND)
LA UNION DEL PUEBLO ENTERO, INC.)
Plaintiffs,)
v.)
STATE OF TEXAS; JOHN STEEN, in his) CIVIL ACTION NO.
Official capacity as Texas Secretary of State;) 2:13-CV-348 (NGR)
and STEVE McCRAW, in his official capacity) [Consolidated case]
as Director of the Texas Department of)
Public Safety,)
Defendants.)

**DEFENDANTS' SUPPLEMENTAL RESPONSE IN OPPOSITION TO
UNITED STATES' MOTION TO COMPEL THE PRODUCTION OF
LEGISLATIVE DOCUMENTS**

During the April 8, 2014 hearing, the Court instructed the review of all the contested attorney-client documents identified by the United States. *See* No. 2:13-cv-193, Minute Entry, Apr. 8, 2014 ("Texas to go through documents by Friday at

noon."); ECF No. 162.1; *and* Ex. 1 (e-mail from D. Freeman to counsel for Defendants, Apr. 3, 2014). That review and supplemental production was completed by noon on April 11, 2014, as instructed by the Court. *See* Ex. 2 (letter from D. Whitley to D. Freeman, Apr. 11, 2014); Ex. 3 Defendants' Document Review (Apr. 11, 2014); *and* Ex. 4 (Supplemental Attorney-Client Privilege Log (Apr. 11, 2014)).

Dated: April 14, 2014

Respectfully submitted,

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/s/ G. David Whitley
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COUNSEL FOR THE STATE OF TEXAS,
RICK PERRY, JOHN STEEN, and STEVE
MCCRAW

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2014, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ G. David Whitley
G. DAVID WHITLEY